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ABSTRACT

A study examined the type and extent of consumer education that occurred since the Consumer Product Safety Commission (CPSC) amended the 1972 federal safety standards (effective January 1997) to permit marketing of snug-fitting, nonflame-resistant cotton garments as sleepwear. Three voluntary point-of-sale (POS) practices recognized as important for informing consumers about the new standard were investigated: removable information labels, signs or educational brochures on children's sleepwear safety standards, and display of children's sleepwear separately from other types of children's apparel. Findings were based on shopping visits to 70 retail stores in 14 metropolitan areas nationwide. Informational hangtags were used in about 73 percent of various brand selections of snug-fitting garments. However, the full range of suggested POS practices had not been widely used. Fewer than 16 percent of the stores visited displayed either consumer education brochures or signs about sleepwear safety requirements; about 63 percent of the stores displayed other clothing on racks with sleepwear--a practice that has been shown to cause consumer confusion. Manufacturers and retailers reported a primary reason they had not been more aggressive in offering consumer information was the uncertain future of the standards. Because standards could be revised or revoked, expenditure of additional resources on education efforts did not make good business sense. (The scope and methodology are appended.) (YLB)

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United States General Accounting Office

GAO

Report to Congressional Committees

June 1999

CONSUMER PRODUCT SAFETY COMMISSION

Consumer Education Efforts for Revised Children's Sleepwear Safety Standard

ED 431 929

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United States
General Accounting Office
Washington, D.C. 20548

Health, Education, and
Human Services Division

B-282019

June 9, 1999

The Honorable Christopher Bond
Chairman
The Honorable Barbara A. Mikulski
Ranking Minority Member
Subcommittee on Veterans' Affairs, HUD,
and Independent Agencies
Committee on Appropriations
United States Senate

The Honorable James T. Walsh
Chairman
The Honorable Alan B. Mollohan
Ranking Minority Member
Subcommittee on Veterans' Affairs, HUD,
and Independent Agencies
Committee on Appropriations
House of Representatives

Reports of children having been severely burned when their pajamas or nightgowns caught fire led to the 1972 federal safety standards that required all children's sleepwear to be flame resistant. In 1996, the Consumer Product Safety Commission (CPSC) amended the standards to permit the marketing of non-flame-resistant cotton garments as sleepwear if such garments met prescribed requirements that they be snug fitting. Snug-fitting sleepwear is considered safe by CPSC because it reduces the possibility of coming in contact with an ignition source and, if it does, allows little air to be trapped between the skin and the clothing to fuel combustion.[1] While CPSC's decision was praised by some industry and consumer advocates as a way to safely expand consumer choice for children's sleepwear, some fire protection groups and other health and safety advocates expressed concern that if consumers replaced the traditional flame-resistant sleepwear with the snug-fitting cotton sleepwear, the number of children injured could increase.

Because correct size selection is important to the effective use of snug-fitting sleepwear—and many parents may not be aware of sleepwear

[1]Sleepwear is considered snug-fitting under this standard if it follows prescribed measurements to ensure that the garment touches a child's body at seven crucial points: the chest, waist, seat, thigh, ankle, wrist, and upper arm. In addition to allowing the sale of snug-fitting non-flame-resistant sleepwear, the standards exempt all infant sleepwear sizes 9 months or under from flame-resistant requirements.

standards in general—CPSC undertook efforts to educate consumers on the new standard. CPSC worked with industry groups, such as the American Apparel Manufacturers Association (AAMA), to voluntarily provide in-store point-of-sale information when consumers make their purchase decisions. The fiscal year 1999 appropriations act covering CPSC and its accompanying conference report directed us to examine the type and extent of consumer education that occurred since the revised standard went into effect in January 1997.

We examined three voluntary point-of-sale practices that CPSC and others recognize as important for informing consumers about the new standard:

- removable information labels, called hangtags, on sleepwear garments;
- signs or educational brochures to inform consumers about children's sleepwear safety standards; and
- display of children's sleepwear separately from other types of children's apparel.

This report follows our report on children's burn injury information, issued April 1999 also in response to the congressional mandate.[2] In that report, we concluded that sufficient data are not available to measure changes, if any, in the number of burn injuries associated with children's sleepwear before and after CPSC amended its standards.[3]

Our findings for this report are based on shopping visits to 70 retail stores in 14 metropolitan areas across the nation. Our methodology did not include an assessment of the extent that the presence or absence of point-of-sale information or practices changed consumer behavior or affected the rate of burn injuries to children. Appendix I describes our scope and methodology in more detail. We did our work between January and June 1999 in accordance with generally accepted government auditing standards.

Results in Brief

As a result of cooperative efforts among CPSC, children's sleepwear manufacturers, and retailers, progress has been made in making point-of-sale information on sleepwear safety standards available to

[2]The Congress directed CPSC to determine by July 1, 1999, whether to revoke, maintain, or modify its earlier decision. At the same time, the Congress directed us to develop information that would help in this deliberation.

[3]See Consumer Product Safety Commission: Injury Data Insufficient to Assess the Effect of the Changes to the Children's Sleepwear Safety Standard (GAO/HEHS-99-64, Apr. 1, 1999).

consumers. We found in our shopping sample that informational hangtags—the most prevalent form of consumer education material available—were used in about 73 percent of various brand selections of snug-fitting garments.

However, the full range of suggested point-of-sale practices has not been widely used. Fewer than 16 percent of the stores we visited displayed either consumer education brochures or signs about sleepwear safety requirements. Also, about 63 percent of the stores displayed other clothing, such as cotton long underwear and loose-fitting cotton T-shirts, on racks with sleepwear—a practice that has been shown to cause consumer confusion.

Manufacturers and retailers told us that a primary reason that they had not been more aggressive in offering consumer information was the uncertain future of the standards. Because the standards that enabled snug-fitting sleepwear to be marketed could be revised or revoked, the expenditure of additional resources on education efforts relative to this product did not make good business sense.

Background

CPSC was established in 1972 under the Consumer Product Safety Act (P.L. 92-573) to regulate consumer products that pose an unreasonable risk of injury, to assist consumers in using products safely, and to promote research and investigation into product-related deaths, injuries, and illnesses. CPSC has the authority to issue regulations that establish performance or labeling standards for consumer products. Although CPSC has broad regulatory powers, much of its efforts are carried out using nonregulatory methods. CPSC often assists in the development or improvement of voluntary efforts to address product hazards such as providing safety information to consumers.

Before CPSC was established, the Department of Commerce implemented a specific flammability standard for children's sleepwear.[4] This standard required that fabrics used for children's sleepwear self-extinguish when exposed for 3 seconds to a small open flame. The standard did not prescribe specific fabrics or require flame-retardant treatments. Some fabrics, mostly polyester, generally could meet the requirement without treatment; others, mostly cotton, would do so only if treated with a flame-retardant chemical. Because of the potential carcinogenic nature of

[4]Commerce's 1972 sleepwear standard covered only sizes up to size 6x; in 1975, CPSC extended the children's sleepwear standard to sizes 7 through 14.

one treatment chemical in use in the 1970s, polyester became the manufacturers' fabric of choice in producing children's sleepwear.

In the 1980s, however, many consumers began to demand natural fibers, such as cotton, for children's sleepwear. To meet this demand, retailers began stocking cotton and cotton-blend long underwear sets that were not subject to CPSC's flammability standard for children's sleepwear. Sometimes these sets were intermingled with flame-resistant sleepwear on children's sleepwear racks. CPSC compliance staff, consumer groups, and industry sources agreed that, in this environment, enforcing the standard had become difficult and required a significant amount of agency resources.

In 1991, CPSC began reexamining the children's sleepwear standard. In April 1996, two of the three CPSC Commissioners voted to amend the children's sleepwear standards to exempt snug-fitting sleepwear and all infants' clothing up to size 9 months from the flame-resistant requirements.[5] Snug-fitting sleepwear garments meeting the revised standards were made widely available to consumers during the fall 1998 selling season.

While the revised standard did not include consumer education requirements, such as additional permanent garment tags, CPSC recognized the need for consumer education during deliberations about the new standards. To address this need, CPSC has issued three press releases and one video news release to inform consumers about the new sleepwear standards and to warn consumers against using loose-fitting cotton garments as sleepwear.[6] According to CPSC, its press releases were sent to over 1,200 media sources and its video release was broadcast over 200 times by local television stations for an estimated audience of 13 million people.

In voting for the standards, one Commissioner specifically outlined the importance of providing visible point-of-sale information to remind consumers of the purpose of the standards, and of separating the displays

[5]The two Commissioners supporting the amendment contended that the snug-fitting sleepwear would provide a safe sleepwear alternative for consumers who want cotton garments. The Commissioner opposed to the amendment argued that the snug-fitting sleepwear could increase injuries if more consumers use it to replace traditional flame-resistant sleepwear and purchase it in larger sizes to increase comfort and to allow a child to grow into the garment.

[6]According to CPSC, loose-fitting T-shirts or other oversized clothes are the most hazardous garments for children to sleep in because they can easily come in contact with small open flames and, once ignited, they will burn rapidly.

of complying sleepwear from other clothing to avoid confusion. However, because CPSC has limited funding available for consumer education, it has worked with the apparel industry to promote voluntary point-of-sale information.

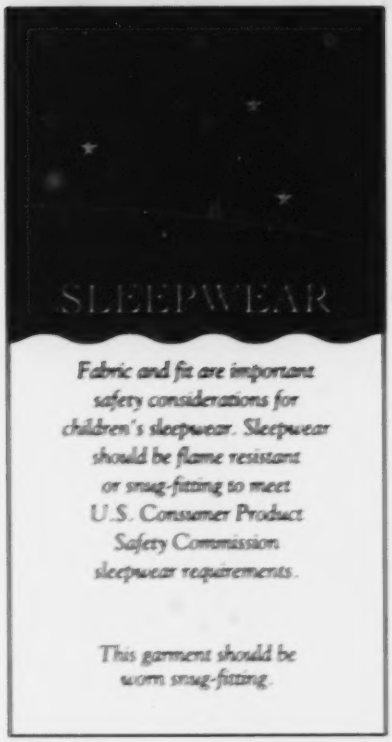
Information Hangtags Used on Most Children's Sleepwear

In proposing the new standard, CPSC had planned on requiring permanent consumer information labels on garments. However, the apparel industry was strongly opposed to the mandatory labeling requirement and agreed to use a removable label, such as a hangtag, to provide the point-of-sale information. Thus, the standards were passed with the understanding that the industry would voluntarily undertake an information and education campaign. At the 70 stores that we visited, we found overall that garment hangtags were the most common form of point-of-sale information available to consumers.

As the primary trade organization representing about 85 percent of the apparel wholesale industry, AAMA worked with CPSC to design a consumer education hangtag and made it available to manufacturers and importers for use in packaging their products. The AAMA hangtag includes

- artwork to identify garments as sleepwear,
- a statement that explains the importance of fabric and fit in children's sleepwear and that sleepwear should be flame-resistant or snug-fitting to meet CPSC's requirements, and
- whether a garment is flame-resistant or should be worn snug-fitting (see fig. 1).

Figure 1: Sample of AAMA Garment Hangtag Design for Snug-Fitting Sleepwear


SLEEPWEAR
Fabric and fit are important safety considerations for children's sleepwear. Sleepwear should be flame resistant or snug-fitting to meet U.S. Consumer Product Safety Commission sleepwear requirements.
This garment should be worn snug-fitting.

During our store visits, we specifically examined whether AAMA or other hangtags containing similar wording were used on the garments marketed under each brand choice that we encountered.[7] At each store, we observed the sleepwear displays in departments for infants/toddlers, boys, and girls. We paid particular attention to the presence of hangtags on snug-fitting garments because of the concern that consumers need to understand the importance of proper size selection.

Overall, we found that of the 273 brand choices of children's snug-fitting sleepwear we identified at the 70 stores that we visited, 199—or about

[7]For analysis purposes, we defined "brand choice" as a distinctly identifiable brand, trademark, or manufacturer name shown on the inside label or hangtag of the garments. Two or more styles of the same brand were counted as one brand choice if they were found in the same department in the same store. However, if the same brand was found, for example, in two different departments or stores, it would be counted as two brand choices.

73 percent—had information hangtags attached to them. Of these, 70 percent used the AAMA-designed hangtag and 30 percent used other types of hangtags. The other types of hangtags vary significantly in their design but generally contain the same basic language used in the AAMA hangtag. We noted that the garments without hangtags were not associated with a specific retail chain. Garments without hangtags generally represented brands that were less prevalent at the stores that we visited.

Neither CPSC nor the industry has assessed the extent to which consumers use this information in selecting the proper size of snug-fitting garments.

Store Signs and Separate Merchandise Displays Present in Few Stores

While the information hangtags can be helpful to consumers who read them, consumers may not know that they should look for the labels or hangtags when they shop for children's sleepwear. Thus, CPSC and industry officials agree that in-store signs and brochures are important in supporting point-of-sale information for consumers who are unfamiliar with the sleepwear safety requirements. However, few of the stores that we visited displayed store signs to alert consumers about the revised sleepwear standards and the importance of examining sleepwear labels or hangtags in making selections. Of the 70 stores that we visited, only 11 stores, represented mainly by 2 retail chains, had some store signs on display to inform consumers about the new standards.[8] These large signs generally replicated the consumer information contained in the AAMA hangtags. None of the stores we visited had any consumer information brochures on display.

CPSC has also noted the importance of having proper designation and separation of sleepwear display from that of other children's apparel to make it easy for consumers to distinguish sleepwear that meets CPSC standards from other types of clothing, such as children's playwear or T-shirts, that are not subject to the standards. Again, however, most stores did not designate or separate children's sleepwear. Over two-thirds of the stores we visited did not display any signs to designate product display racks as sleepwear so consumers can easily identify sleepwear from other garments. In addition, nearly 63 percent of the stores we visited mixed sleepwear with other clothing, such as long underwear or cotton T-shirts, on the same display racks as children's sleepwear. (See table I.)

[8]In one additional chain, we found an indication that signs were present during the fall and winter of 1998 but had been removed after the holiday season.

Table 1: Sleepwear Display Practices in Stores Sampled, March and April 1999

Display practice	Number of stores	Percent of total
Stores carrying snug-fitting cotton sleepwear	67	96
Stores with consumer information signs on display in one or more children's apparel departments	11	16
Stores with signs to designate racks for sleepwear in one or more children's apparel departments	23	33
Stores that mixed other garments with sleepwear in one or more children's apparel departments	44	63

The lack of sleepwear designation and the mixing of sleepwear with other clothing could confuse consumers because some of the other clothing can be quite similar to sleepwear in appearance. For example, because of the lack of sleepwear designation signs, we often had to get help from sales staff to find the children's sleepwear on display. In a few instances, we were directed by the salesperson to garments that resembled cotton sleepwear, but upon closer examination, we found that the garments had labels inside that read "not intended for use as sleepwear."

Consumer Education Efforts Hindered by Uncertainty About Life of Revised Standards

In early 1997, AAMA developed a consumer information brochure containing clear guidelines to help consumers select safer sleepwear. AAMA officials told us that they had produced a large supply of the brochures and made them available to retailers and manufacturers; but so far, only one retailer and two manufacturers have requested the brochures. Because of the small number of brochures requested, AAMA officials said that they probably never reached the consumers. Apparel industry officials cited the uncertainty surrounding the initial and current likelihood of the continuation of the new sleepwear standard and product as the main reasons for their lack of a more aggressive consumer education effort.

AAMA also issued two press releases and developed a press kit, which, according to officials, was to be used to launch a comprehensive consumer information campaign targeting general media as well as parenting and medical magazines. But AAMA officials decided to suspend this effort initially because of industry concerns about the ability to successfully produce and market snug-fitting products that met CPSC's sizing standards. Soon after the passage of the 1996 amendments, AAMA and other industry groups expressed concerns that adherence to the specific measurements required by CPSC's sizing standards would produce impractical and unwearable snug-fitting products. As a result, CPSC began making technical revisions to the standards and, in May 1998, published a

notice of proposed rulemaking to change some of the specifications of the garments; final technical changes were published in January 1999. Because of these changes, the new snug-fitting sleepwear garments were not made widely available to consumers until fall 1998. After this initial selling season, AAMA officials said they were very encouraged with the market acceptance of the new products and estimated that, in March 1999, the new snug-fitting products made up about 15 percent of the children's sleepwear market. Our store visits confirmed that most of the retail stores have begun to market the new snug-fitting sleepwear; 67 of the 70 stores we visited carried at least one brand choice of snug-fitting cotton garment.

While the concerns about the initial acceptance of the product have been allayed, the industry has continued to postpone committing additional resources to informing and educating consumers because of its fear that the standards will not be maintained. If the standards are revoked, snug-fitting cotton sleepwear would no longer meet the sleepwear safety standards, and the market for the product would disappear.

Conclusions

Our work indicates that while consumers often have some information on children's sleepwear safety available at the point-of-sale, it is not to the extent envisioned by CPSC. The effectiveness of this consumer education effort is unknown, however, for at least two reasons. First, neither CPSC nor the industry has assessed whether consumers use this information to select the proper size of snug-fitting garments. Second, there is a lack of data about the extent of recent sleepwear-related burn injuries. The absence of these data prevents an independent determination about whether the new standards pose an increased risk to children and whether a need exists for more consumer information and education or some other strategy to promote sleepwear safety.

Agency Comments

We provided a draft of this report to CPSC for its review and comment. In its response, reprinted as appendix II, CPSC stated that the report provides valuable and helpful information about the extent and type of educational materials available to consumers. It also stated that the results of our survey of retail stores were consistent with information provided by others.

However, CPSC expressed concern about our statement in the conclusions that the effectiveness of the education effort was unknown, in part,

because of the lack of data on the extent of recent sleepwear-related burn injuries. CPSC believes this statement to be unfounded, citing three reasons.

- First, CPSC asserts there are data to support the position that the sleepwear amendments have not increased injuries. We do not agree with this assertion. In our April 1999 report, we found that data on the actual number of injuries are not available, which makes it difficult or impossible to observe trends in the number of injuries over time. We also recognized that obtaining such data would be difficult and costly. In this report, our point is that without such data, it is hard to know whether a more extensive education campaign is at least indicated.
- Second, CPSC commented that the safety of the snug-fitting garments does not depend on a consumer education program. We do not believe that CPSC's record or its past actions support this comment. For example, in several published alerts to consumers, CPSC and the industry viewed the education campaign as important to promote a safer choice of sleepwear. In fact, the hangtag wording, developed jointly by CPSC and industry, included the phrase ". . . fabric and fit are important safety considerations . . . ."
- Last, CPSC stated that our study was not intended to evaluate the effectiveness of consumer education in reducing burn incidents. Our report acknowledges that our study was not designed to measure this link. Nevertheless, we think it is important to elaborate on this limitation so that our overall findings can be viewed in the perspective of consumer safety. Therefore, we continue to believe that our conclusions are both valid and founded in fact.

We also provided a copy of our draft report to the AAMA for its review and comment. The association's Director of Government Relations informed us that, overall, the association agreed with the presentation of the facts.

Both CPSC and the AAMA provided technical comments, which we incorporated as appropriate.

We are sending copies of this report to Ann Brown, Chairman, CPSC; Thomas H. Moore, Commissioner, CPSC; Mary Sheila Gall, Commissioner, CPSC; and appropriate congressional committees. We will also make copies available to others upon request. If you or your staff have any questions about this report, please contact me at (202) 512-7118 or Frank Pasquier,

Assistant Director, at (206)-287-4861. Major contributors to this report include Sophia Ku and Matt Byer.

Kathryn G. Allen
Associate Director, Health Financing
and Public Health Issues

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Abbreviations

AAMA	American Apparel Manufacturers Association
CPSC	Consumer Product Safety Commission

Scope and Methodology

To select stores to visit, we first identified national and regional discount, department, and children's apparel specialty stores having large sales volume, using data published in 1998 by the National Retail Federation. We categorized these retailers into three groups based on volume of sales:

- large-volume discount or department stores,
- other discount or department stores, and
- children's apparel specialty stores.

In each of 14 metropolitan areas in which GAO has field offices, we judgmentally selected 5 stores to visit that included a mixture of all categories. The 70 stores that we visited consisted of 23 separate retail chains. We visited the stores in March and April 1999. Table I.1 shows the details on the stores we visited in each category by location.

Table I.1: Details on Retail Stores Visited by GAO in March/April 1999 to Observe Point-Of-Sale Practices for Children's Sleepwear

Store type	Number of stores visited	Locations
Major discount or department store chain		
J.C. Penney	10	Sacramento, Calif.; Daly City, Calif; Westminster, Colo.; Tucker, Ga.; Lombard, Ill.; Hyattsville, Md.; Clackamas, Oreg.; Dallas, Tex.; Hampton, Va.; Tukwila, Wash.
Kmart	4	Fairview Heights, Ill.; Shawnee, Kans.; Somerville, Mass.; Laurel, Md.
Sears	4	Santa Monica, Calif.; Tucker, Ga.; Cambridge, Mass.; Virginia Beach, Va.
Target	7	Sacramento, Calif.; Colma, Calif.; Manhattan Beach, Calif.; Broomfield, Colo.; Lombard, Ill.; Shawnee, Kans.; Clackamas, Oreg.
Wal-Mart	3	O'Fallon, Ill.; Plano, Tex.; Bremerton, Wash.
Other discount or department store chain		
Bloomingdale's	1	Los Angeles, Calif.
Bon Marche	1	Silverdale, Wash.
Dillard's	1	Dallas, Tex.
Filene's	1	Boston, Mass.
Foley's	1	Westminster, Colo.
Hecht's	2	Hyattsville, Md.; Hampton, Va.
Lord & Taylor	3	Atlanta, Ga.; St. Louis, Mo.; Dallas, Tex.
Macy's	3	Sacramento, Calif.; San Francisco, Calif.; Boston, Mass.
Marshalls	2	Merriam, Kans.; Hampton, Va.
Meier & Frank	1	Portland, Oreg.
Mervyn's	3	Los Angeles, Calif.; Westminster, Colo.; Tukwila, Wash.
Montgomery Ward	3	Lombard, Ill.; Overland Park, Kans.; Baltimore, Md.
Nordstrom	4	Sacramento, Calif.; San Francisco, Calif.; Oakbrook, Ill.; Portland, Oreg.
Rich's	1	Atlanta, Ga.
T.J. Maxx	1	Fairview Heights, Ill.
Children's apparel		
Babies"R"Us	1	Virginia Beach, Va.
Baby Gap, GapKids	9	Sacramento, Calif.; Los Angeles, Calif.; Boulder, Colo.; Atlanta, Ga.; Cambridge, Mass.; St. Louis, Mo.; Portland, Oreg.; Dallas, Tex; Seatac, Wash.
Kids"R"Us	4	Colma, Calif.; Lombard, Ill.; Overland Park, Kans.; Laurel, Md.

For each store, we visited up to three separate departments:

- infants (sizes 9 to 24 months) or toddler boys and girls (sizes 2 to 4) or both,
- boys (sizes 4 to 14), and
- girls (sizes 4 to 14).

We approached each store visit as if we were "shopping" for children's sleepwear and observed whether there was available information, such as signs, labels, and hangtags, that (1) differentiated the new snug-fitting products from the traditional flame-resistant sleepwear and (2) informed consumers about the snug-fitting requirements of the new products. We also tried to assess how difficult it was to differentiate the sleepwear from other garments not intended as sleepwear, such as cotton long underwear or sweatshirts, by noting whether the sleepwear racks were plainly marked and whether the sleepwear was displayed separately or mixed in with nonsleepwear.

During our store visits, we specifically examined whether AAMA or other hangtags (containing similar wording) were available on the garments marketed under each brand choice that we encountered. For analysis purposes, we defined "brand choice" as a distinctly identifiable brand, trademark, or manufacturer name shown on the inside label or hangtag of the garments. We considered each department within each store as a separate observation. As a result, the same brand was counted as a separate "brand choice" each time that it was carried by the department visited.

Although the results from the 70 stores we visited are not statistically projectable to all retail outlets in the country, we believe our findings are typical of situations that many shoppers would encounter in making decisions about buying children's sleepwear. We chose a variety of stores, focusing mainly on chains that carry children's apparel with the greatest sales volume under the assumption that these stores represent the retail environment that a large proportion of consumers experience when shopping for children's sleepwear. Several of these chains also have stores located in less populated, nonmetropolitan areas.

Comments From the Consumer Product Safety Commission

U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

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May 27, 1999

Ms. Kathryn G. Allen
Associate Director
Health Financing and Public Health Issues
U.S. General Accounting Office
4th and G Streets, N.W.
Washington, D.C. 20548-0001

Dear Ms. Allen:

This letter presents the comments of the staff of the U.S. Consumer Product Safety Commission ("CPSC") on the draft report of the General Accounting Office ("GAO") report entitled "Consumer Education Efforts for Revised Children's Sleepwear Safety Standard."

The report provides valuable and helpful information about the extent and type of educational materials available to consumers in retail stores relating to the Commission's tight-fitting amendment to the Children's Sleepwear Flammability Standard. The results of the GAO survey are consistent with information provided by others regarding the extent of the industry's education efforts.

However, the CPSC staff is concerned about the statement in the conclusion section of the report that GAO is unable to evaluate the effectiveness of the consumer education program because, in part, there is a lack of data about the extent of recent sleepwear-related burn injuries. The staff believes this statement is unfounded.

First, the CPSC staff concludes that the available data support the position that the 1996 sleepwear amendments have not resulted in an increase of injuries and that the CPSC surveillance system is more than adequate for identifying an increase in burn injuries from sleepwear. Second, the safety of tight-fitting garments does not depend on a consumer education program. Third, the analysis by GAO simply could not, and was not intended to, evaluate the effectiveness of the industry's education efforts to reduce burn incidents regardless of the quality of CPSC's sleepwear data.

Ms. Kathryn G. Allen
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In conclusion, while CPSC staff believes that the information presented by the GAO report is valuable and helpful, we do not believe that the study itself supports the GAO statement discussed above.

Sincerely,

Pamela Gilbert

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